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May 5, 2021

VIA ECF

Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Zaitsev, et al.*
Docket No.: 20-cv-03495-FB-SJB

Dear Magistrate Judge Bulsara:

We are counsel to Plaintiffs (collectively "GEICO") in the above referenced matter. Pursuant to the Court's March 22, 2021 Minute Entry and Order (see Docket Entry dated March 22, 2021), and together with counsel for Tri-State Multi-Specialty Medical Services, P.C., Riverside Medical Services, P.C., and Kristappa Sangavaram, M.D. (collectively, the "Sangavaram Defendants"), we respectfully submit this joint status letter.

The current fact discovery deadline is July 30, 2021, and discovery has been proceeding. See the Court's April 14, 2021 Order at Docket Entry dated April 14, 2021. The Sangavaram Defendants produced written discovery responses and initial documents on April 30, 2021. GEICO is currently working to identify deficiencies in those responses and production and intend to reach out to the Sangavaram Defendants by the end of the week in an effort to resolve those deficiencies.

For its part, GEICO has produced its investigative file to the Sangavaram Defendants. GEICO has also produced an initial batch of claim files to the Sangavaram Defendants and anticipates that the remainder of its claim files will be produced by the middle of next week.

Against this backdrop, Counsel for the parties anticipate that all written discovery and document production will be complete by mid-June and that the parties will begin conducting the necessary party and non-party depositions shortly thereafter.

We appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

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/s/ Colleen O'Neil
Colleen O'Neil

cc: All counsel via ECF